

1 **DICKINSON WRIGHT PLLC**

MICHAEL N. FEDER (Nevada Bar No. 7332)

2 Email: mfeder@dickinson-wright.com

3883 Howard Hughes Parkway, Suite 800

3 Las Vegas, Nevada 89169

Tel: (702) 550-4400

4 Fax: (844) 670-6009

5 **MINTZ & GOLD LLP**

PETER GUIRGUIS (Admitted Pro Hac Vice)

6 Email: guirguis@mintzandgold.com

SCOTT KLEIN (Admitted Pro Hac Vice)

7 Email: klein@mintzandgold.com

600 Third Avenue

8 New York, NY 10016

Tel: (212) 696-4848

9 Fax: (212) 696-1231

10 *Attorneys for Venetian Casino Resort, LLC and*
11 *Interfact Group-Nevada, Inc.*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 VENETIAN CASINO RESORT, LLC, a
Nevada limited liability company,

15 Plaintiff,

16 v.

17 ENWAVE LAS VEGAS LLC, a Delaware
18 limited liability company,

19 Defendant.

22 ENWAVE LAS VEGAS LLC, a Delaware
23 limited liability company,

24 Counterclaimant,

25 v.

26 VENETIAN CASINO RESORT, LLC, a
27 Nevada limited liability company, and
INTERFACE GROUP-NEVADA, INC., a
Nevada corporation,

28 Counterdefendants.

Case No. 2:19-cv-01197-JCM-DJA

**STIPULATION AND [PROPOSED]
ORDER FOR AN EXTENSION OF
TIME FOR VCR AND INTERFACE TO
RESPOND TO GCS'S AMENDED
COUNTERCLAIM**

[AMENDED SIXTH REQUEST]

1 GRAND CANAL SHOPS II, LLC, a
2 Delaware limited liability company,

3 Counterclaimant,

4 v.

5 VENETIAN CASINO RESORT, LLC, a
6 Nevada limited liability company

7 Counterdefendant.¹

8 Plaintiff/Counterdefendant VENETIAN CASINO RESORT, LLC, (“VCR”) and
9 Counterdefendant INTERFACE GROUP-NEVADA, INC. (“Interface,” collectively with VCR,
10 “Venetian Parties”), by and through their counsel of record the law firms of Dickinson Wright
11 PLLC and Mintz & Gold LLP, Defendant/Counterclaimant ENWAVE LAS VEGAS LLC
12 (“Enwave”), by and through its counsel of record the law firms of Brownstein Hyatt Farber
13 Schreck, LLP and Baker Donelson Bearman Caldwell & Berkowitz, PC, and Intervenor GRAND
14 CANAL SHOPS II, LLC (“GCS”), by and through its counsel of record the law firms of King &
15 Spalding LLP and Santoro Whitmire, hereby stipulate and agree, subject to this Court’s approval,
16 pursuant to Local Rule 7-1 and Local Rule IA 6-1 to extend the deadline for the Venetian Parties
17 to file a response to GCS’s Amended Counterclaim (current deadline is June 25, 2021), as follows:

18 1. On June 22, 2021, the parties filed a stipulation and proposed order for an extension
19 of time for the Venetian Parties to respond to GCS’s Amended Counterclaim to July 14, 2021.
20 (ECF No. 103).

21 2. On June 25, 2021, the Honorable Magistrate Judge Brenda Weksler entered an
22 order denying the stipulation filed on June 22, 2021 without prejudice because “[t]he parties do
23 not explain what good cause exists to grant another extension to respond to GCS’s Amended
24 Counterclaim.”

25 3. By way of further explanation, the parties have entered into settlement discussions
26 with the hope of resolving litigation and, as such, need the additional time so the parties can focus
27

28 ¹ The Venetian Parties object to the caption as incorrectly listing VCR as the Counter Defendant.

1 their resources on settling this matter.

2 4. Accordingly, the Venetian Parties and GCS hereby stipulate, subject to the Court's
3 approval, that the Venetian Parties shall file any motion to strike GCS's Amended Counterclaim
4 by July 14, 2021. This is the sixth request to extend the foregoing deadlines, and all parties submit
5 that good cause exists for these extensions and that they are not intended for purposes of delay.

<p>6 DATED this 28th day of June, 2021.</p> <p>7 DICKINSON WRIGHT PLLC</p> <p>8 <u>/s/ Michael N. Feder</u></p> <p>9 MICHAEL N. FEDER, ESQ. (NBN 7332)</p> <p>10 3883 Howard Hughes Parkway, Suite 800</p> <p>11 Las Vegas, Nevada 89169</p> <p>12 PETER GUIRGUIS, ESQ. (Pro Hac Vice)</p> <p>13 SCOTT KLEIN, ESQ. (Pro Hac Vice)</p> <p>14 MINTZ & GOLD LLP</p> <p>15 600 Third Avenue</p> <p>16 New York, NY 10016</p> <p><i>Attorneys for Plaintiff-Counterdefendant</i> <i>Venetian Casino Resort, LLC and</i> <i>Counterdefendant Interface Group-Nevada,</i> <i>Inc.</i></p>	<p>7 DATED this 28th day of June, 2021.</p> <p>8 SANTORO WHITMIRE</p> <p>9 <u>/s/ Lawrence Slovensky</u></p> <p>10 JAMES E. WHITMIRE, ESQ. (6533)</p> <p>11 10100 W. Charleston Blvd., Suite 250</p> <p>12 Las Vegas, Nevada 89135</p> <p>13 LAWRENCE SLOVENSKY, ESQ.</p> <p>14 (Pro Hac Vice)</p> <p>15 KING & SPALDING LLP</p> <p>16 1180 Peachtree St. NE</p> <p>17 Atlanta, GA, 30309</p> <p><i>Attorneys for Intervenor-</i> <i>Defendant/Counterclaimant Grand Canal</i> <i>Shops II, LLC</i></p>
<p>17 DATED this 28th day of June, 2021.</p> <p>18 BROWNSTEIN HYATT FARBER</p> <p>19 SCHRECK, LLP</p> <p>20 <u>/s/ Emily A. Ellis</u></p> <p>21 ADAM K. BULT, ESQ. (NBN 9332)</p> <p>22 EMILY A. ELLIS, ESQ. (NBN 11956)</p> <p>23 100 North City Parkway, Suite 1600</p> <p>24 Las Vegas, NV 89106-4614</p> <p>25 MATTHEW A. WOOLF, ESQ.</p> <p>26 (Pro Hac Vice)</p> <p>27 BAKER DONELSON BEARMAN</p> <p>28 CALDWELL & BERKOWITZ PC</p> <p>201 St. Charles Avenue, Suite 3600</p> <p>New Orleans, LA 70170</p> <p><i>Attorneys for Defendant-Counterclaimant</i> <i>Enwave Las Vegas LLC</i></p>	

1 **ORDER**

2 IT IS ORDERED that ECF No. 105 is GRANTED. However, the Court notes that this
3 is the parties' sixth request for an extension of time to respond to GCS's amended
4 counterclaim. The Court does not intend to continue granting extensions of this
5 deadline absent exceptional circumstances showing good cause.

6 **IT IS SO ORDERED**

7 **DATED:** 10:57 am, July 02, 2021

8 

9 **BRENDA WEKSLER**
10 **UNITED STATES MAGISTRATE JUDGE**